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Priority: Normal

TO: 9-NPRM-CMTS at ARM

Subject: Comment to Docket No. 28903

Regarding Docket No. 28903, the proposed rule regarding Type Certification Procedures for Changed Products:

I am opposed to this proposed rule because it will reduce safety in many general aviation aircraft, by limiting the safety-improving modifications available for those aircraft.

This rule is intended to improve safety by requiring the latest airworthiness standards to be applied when certifying modifications to transport aircraft. But the rule does not properly account for general aviation aircraft. Many modifications which would measurably increase safety no longer will be certifiable under the new rule.

In the NPRM, FAA states that it does not intend to restrict modifications which improve safety, but don't meet current certification standards. Unfortunately, that intention is not embodied in the proposed rule itself. This proposed rule could be interpreted in the field contrary to FAA's intention -- an outcome which FAA must carefully guard against, given the current inconsistency and lack of accountability of FAA field staff in applying certification rules.

FAA must revise the proposed rule to better accommodate general aviation aircraft and to ensure that FAA's intention is achieved by the proposed rule.